

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FUJIAN MINGTA TOYS CO. LTD.,

Plaintiff,

v.

**THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A”,**

Defendants.

Civil Action No. 1:24-cv-05625

PLAINTIFF’S MOTION TO FILE UNDER SEAL

Plaintiff Fujian Mingta Toys Co. Ltd. files this motion to file the following documents under seal: (1) Exhibit 1 to the TRO Motion which contains an exemplary infringement chart; (2) Exhibit 2 to the TRO Motion which contains customer reviews of Defendants’ infringing products; and (3) the Declaration of Chen, who is the deputy general manager of Plaintiff.

Sealing this portion of the file is necessary to prevent Defendants from learning of these proceedings prior to the execution of a temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court’s power to grant relief. Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Plaintiff will move to unseal these documents.

DATED: July 4, 2024

Respectfully submitted,

By: /s/ Nicholas Najera

Nicholas Najera

Texas Bar No. 24127049

nnajera@nilawfirm.com

NI, WANG & MASSAND, PLLC

8140 Walnut Hill Ln., Ste. 615

Dallas, TX 75231

Tel: (972) 352-2220

Fax: (972) 314-0900

Counsel for Plaintiff